

ROBERT E. BOYCE  
State Bar No. 79806  
BOYCE & SCHAEFER  
934 23rd Street  
San Diego, CA 92102  
619/232-3320

Attorney for Defendant  
MELISA MELENA MAFNAS

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,	)	CASE NO. 08CR0306-JLS
	)	
Plaintiff,	)	
	)	NOTICE OF MOTION AND MOTION:
v.	)	1) TO COMPEL
	)	DISCOVERY/PRESERVE
MELISA MELENA MAFNAS,	)	EVIDENCE;
	)	2) SUPPRESS STATEMENTS;
	)	AND
Defendant.	)	2) GRANT LEAVE TO FILE
	)	FURTHER MOTIONS
	)	
	)	Date: March 14, 2008
	)	Time: 1:30 p.m.

---

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY and STEPHEN F. MILLER,  
ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 14, 2008, at 1:30 p.m., defendant Melisa Melena Mafnas, by and through her counsel, Robert E. Boyce, will ask this Court to enter an Order granting the following motions: 1) to compel discovery, 2) to suppress statements; and 3) for leave to file additional motions.

**MOTIONS**

Melisa Melena Mafnas, defendant herein, by and through her counsel, Robert E. Boyce, asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel discovery;
- (2) Suppress defendant's statements; and
- (3) Grant leave to file further motions.

These motions are based upon the instant notice of motion and motion, the attached memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials which may be brought to this Court's attention prior to or during the hearing on these motions.

March 11, 2008

Respectfully submitted,

/s/ Robert E. Boyce  
ROBERT E. BOYCE  
Attorney for Defendant  
MELISA MELENA MA